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ILLINOIS COMMERCE COMMISSION

STATE OF ILLINOIS

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Illinois Commerce Commission

On Its Own Motion

Regulation of Meter Service Providers

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Docket 00-0182

CLERK OF COURT

**COMMENTS
OF
CENTRAL ILLINOIS PUBLIC SERVICE COMPANY
AND
UNION ELECTRIC COMPANY**

Central Illinois Public Service Company d/b/a AmerenCIPS and Union Electric Company d/b/a AmerenUE (collectively the "Ameren Companies") hereby submit comments regarding proposed 83 Ill. Admin. Code Part 460, Certification Requirements and Standards of Service for Meter Service Providers.

1. Section 460.430 Meter Tests Required by Entity

The Ameren Companies believe that the standards of service for meter service providers ("MSPS") should be consistent with the standards of service applicable to meter service provided by electric utilities and alternative retail electric suppliers. Such standards of service are the subject of proposed 83 Ill. Admin. Code Part 410, which is being developed in Docket 99-0580. Section 460.400 of proposed Part 460 establishes required intervals for the periodic testing of meters. The required intervals are consistent with the testing intervals proposed by the Commission Staff for inclusion in 83 Ill. Admin. Code Section 410.170 in Docket 98-0580. In accordance with the proposal of the Ameren Companies and other parties to Docket 98-0580, however, the Hearing Examiner's Proposed First Notice Order ("HEPO") in that docket increased the proposed required testing interval for transformer-related poly-phase

("TRP") meters, as set forth in 83 Ill. Admin. Code Section 410.170(b)(3), from 4 years to 8 years. No party took exception to the HEPO's decision in this regard.

Consistent with the proposed rules applicable to electric utilities and ARES in Part 410, therefore, Section 460.400(b)(3) of proposed Part 460 should also be revised to increase the testing interval for TRP meters from 4 years to 8 years. In the event that the Commission makes additional changes to the meter testing intervals proposed for 83 Ill. Admin. Code 410.170(b) in Docket 98-0580, those changes also should be reflected in the comparable provisions of Section 460.400(b) of proposed Part 460.

2. Section 460.510 Illinois Class 1 Qualifications

Section 460.510(e)(2) requires that in order to qualify as a Class 1 meter worker, an employee of an MSP must have a minimum of 500 hours of on-the-job-training with a Class 1 meter worker or a meter worker with higher classification and successful completion of the MSP classroom training program. Class 1 is the lowest classification of meter workers. Class 1 meter workers are qualified to install and replace single phase meters for residential and small commercial customers.

The Ameren Companies believe that the proposed required minimum of 500 hours of training is excessive and would place MSPs at an unfair competitive disadvantage, particularly in the future residential market for unbundled meter services. In this regard, the number of hours of on-the-job-training for Class 1 meter workers required by Illinois electric utilities other than AmerenUE and AmerenCIPS ranges from 40 to 500 hours. Although AmerenCIPS and AmerenUE do not employ Class 1 meter workers, the Ameren Companies require that outside contractors hired to perform tasks for which Class 1 meter workers are qualified must have 40 hours of on-the-job-training. This training requirement has proved to be

adequate. Moreover, the Ameren Companies are unaware of any problems resulting from the use of a 40 hour minimum training requirement by other Illinois electric utilities.

For all the reasons discussed, the Ameren Companies propose that the number of hours required for on-the-job-training to qualify as a Class 1 meter worker, as set forth in Section 460.510(e)(2), be reduced from 500 hours to 40 hours.

Respectfully submitted,

CENTRAL ILLINOIS PUBLIC SERVICE COMPANY
and UNION ELECTRIC COMPANY

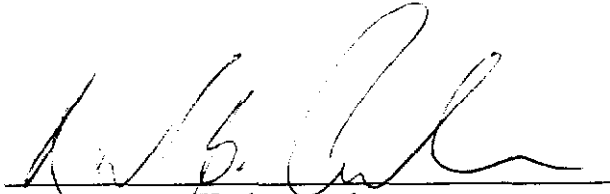
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CERTIFICATE OF SERVICE

I, Karl B. Anderson, certify that on the 26th day of June, 2000 I caused copies of the foregoing Petition to Intervene and Comments of Illinois Public Service Company and Union Electric Company to be served on each of the persons listed on the attached service list via Federal Express delivery.



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DOCKET 00-0182

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